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**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MUHAMMAD ANWAR, ILTAFAT HUSSAIN, AHMED
NADEEM, SALMAN DURRANI, and SHEIKH Z.
AHMAD, individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

TRANSPORTATION SYSTEMS, INC. d/b/a EXECUTIVE
TRANSPORTATION GROUP; LOVE CORPORATE CAR
INC.; N.Y. ONE CORPORATE CAR INC.; LOVE
LIMOUSINE NYC, LTD.; SUMMIT CORPORATE CAR
INC.; N.Y. ACE CORP.; NEWPORT CORPORATE CAR,
INC.; JOHN L. ACIERNO; JOHN L. "CHIP" ACIERNO
III; and JEFFREY ACIERNO,

Defendants.

No. 13 Civ. 2666 (GHW)

**NOTICE OF MOTION FOR APPROVAL OF
FAIR LABOR STANDARDS ACT SETTLEMENT**

For the reasons set forth in the Memorandum of Law in Support of Plaintiffs' Motion for Approval of Fair Labor Standards Act Settlement ("Approval Motion"), in the Declaration of Rachel Bien ("Bien Decl."), and the supporting exhibits attached thereto, Plaintiffs respectfully request that the Court enter an Order:

(1) approving the Joint Stipulation of Settlement and Release, attached as Exhibit A to the Bien Decl.;

(2) approving the Proposed Settlement Notice, attached as Exhibit B to the Bien Decl.;

(3) approving service payments of \$1,000 each for Plaintiffs Muhammad Anwar, Iltafat Hussain, Ahmed Nadeem, Salman Durrani, and Sheikh Z. Ahmad and for opt-in Plaintiff Mohammad Faridi;

(4) approving Plaintiffs' counsel's request for one-third of the settlement fund (\$120,000) as their attorneys' fees and reimbursement of \$20,000 in out-of-pocket costs; and

(5) granting any other relief that the Court deems just and proper.

* * *

Plaintiffs have contemporaneously submitted a Proposed Order, attached hereto as **Exhibit A**, for the Court's convenience.

Dated: November 11, 2014
New York, New York

Respectfully submitted,

By: /s/ Rachel Bien

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